

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA DANVILLE DIVISION

CLERK'S OFFICE U.S. DIST. COURT AT CHARLOTTESVILE, VA FILED

JUN 1 1 2018

JULIA O DUBLEY, CLERK
BY: DEPUTY CLERK

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Criminal Number: 4:18-c1-00012
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) In Violation of:
) 18 U.S.C. § 2
) 18 U.S.C. § 924(c)(1)(A)(iii)
) 18 U.S.C. § 924(j)
) 18 U.S.C. § 1959(a)(1), (3), (5)
) 18 U.S.C. § 1962 (d)
) 18 U.S.C. § 1963
) 18 0.5.C. § 1905
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) INDICTMENT
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COUNT ONERacketeering Conspiracy

The Grand Jury charges:

Introduction

- 1. The New York Bloods Nation" (herein, "Bloods") street gang was formed in 1993 in New York City.
- 2. The Bloods street gang is comprised of individual units, or "sets," each identified or affiliated with a certain street, neighborhood, or geographic area.
- 3. The MILLAs ("MILLAs") is a set of the Bloods street gang that has operated in the Western District of Virginia, primarily Danville, Virginia, since at least sometime in or about 2015.
 - a. In addition to their violent criminal activity, the MILLAs derive income from drug distribution and sales of firearms and stolen property.
 - b. The MILLAs operate within a defined geographic territory within Danville, Virginia. MILLAs maintain control over their territory through the use of violence.
 - c. Members of the MILLAs are mainly initiated through "beat ins" that typically consist of a twenty-one second beating by multiple gang members. A member can also be "blessed in" by doing a predetermined crime or list of crimes, such as a murder or a series of robberies or by virtue of having belonged to another Bloods set. Female members can also be initiated by having sexual intercourse with multiple gang members.

- d. The MILLAs commonly utilize a variety of unifying marks, manners, and identifiers, including "gang signs" that are specific to the gang organization. Among others, these insignia include the 5-pointed star. The members of the MILLAs often identify themselves by using one hand to form an "M," showing they are members of the MILLA Bloods gang. Members of the MILLAs also identify themselves with red colored clothing or wearing a red bandana or "flag," as is typical with Bloods gangs nationally.
- e. The MILLAs operate under a specific hierarchy and leadership structure.

 Generally, members are ranked based upon how long an individual has been a member of the gang, the number and severity of crimes an individual has committed on behalf of the gang, and other contributions to the gang and its enterprise. Different "positions" within the gang have different names, such as "one-star" or "Low" which indicates the level that person holds within the gang structure. Members can advance within the leadership structure. The MILLAs function according to a set of rules sometimes contained in "books of knowledge." The books of knowledge can describe such things as the leadership structure, oaths, regulations, and gang history.
- f. Members of the MILLAs are required to possess firearms. Members of the MILLAs show themselves brandishing these weapons in publicly available videos and photographs on social media, such as Facebook, in

order to promote the gang's violent and intimidating image. The members of the MILLAs also use social media as a recruitment tool.

4. At all times relevant to this Indictment, the MILLAs, in the Western District of Virginia and elsewhere, engaged in criminal activity, including but not limited to: assault; robbery; attempted murder; murder; drug trafficking; and conspiracy to commit those crimes.

The MILLA members committed criminal acts, including acts of violence, to maintain membership within the gang.

The Racketeering Enterprise

- 5. At all times relevant to this Indictment, defendants DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, MONTEZ LAMAR ALLEN, JAVONTAY JACQUIS HOLLAND, TANASIA LASHAE COLEMAN, JERMAY SMITH, JR., JALEN CORMARRIUS TERRY, and others known and unknown, were members and associates of a criminal organization, the MILLAs, a set of the Bloods street gang, engaged in, among other things, acts involving murder, robbery, assault, and the trafficking of controlled substances, within the Western District of Virginia and elsewhere.
- 6. The MILLAs, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

7. The purposes of the enterprise included promoting and enhancing the enterprise and its reputation through, among other things, committing acts of violence, including acts involving murder, assault, and robbery; enforcing discipline among the members; enriching its members and associates through among other things, trafficking in controlled substances and committing acts of violence including robbery; prolonging the activities of the enterprise by providing assistance to members of the enterprise who committed crimes for and on behalf of the enterprise, and by thwarting efforts of law enforcement to apprehend enterprise members.

Manner and Means of the Enterprise

- 8. Among the manner and means by which the members and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:
 - a. Members engaged in shootings and acts involving murder;
 - b. Members of the enterprise and their associates robbed individuals and businesses;
 - c. Members of the enterprise and their associates trafficked in firearms, which involved the straw purchase of the firearms in Virginia and selling them in other states;
 - d. Members of the enterprise and their associates obstructed justice by destroying and hiding evidence and firearms with the intent to impair their availability for use in an official proceeding;
 - e. Members of the enterprise and their associates distributed controlled substances, and used the proceeds of those drug

transactions to benefit gang members and to help finance their enterprise.

Role of the Defendants and Co-Conspirators

- 9. The roles of the defendants and co-conspirators included, but were not limited to, the following:
- a. DASHAWN ROMEER ANTHONY, a/k/a "Shon Don" or "Stunna," was a member of the MILLAs, and was a leader of the enterprise who directed and guided other members of the enterprise in carrying out certain unlawful and other activities in furtherance of conducting the enterprise's affairs. His rank was a "Low" (also called "Big Homie"), which placed him at the top of the racketeering enterprise hierarchy in Danville at times relevant to this indictment.
- b. DEMETRIUS ALLEN STATEN, a/k/a "Truck," was "blessed" into the MILLAs by ANTHONY and maintained a leadership position in the racketeering enterprise. STATEN's position within the racketeering enterprise was as a 5-Star, one level below co-defendant ANTHONY.
- c. TREDARIUS JAMERIQUAN KEENE, a/k/a "Bubba" or "Bubs" was a member of the MILLAs and was, at one time, ranked as a 5-star.
 - d. MONTEZ LAMAR ALLEN, a/k/a "Doc" was a member of the MILLAs.
- e. JAVONTAY JACQUIS HOLLAND, a/k/a "Tay" or "Reckless" was a member of the MILLAs and, at one time, held various leadership ranks for the racketeering enterprise.
- f. TANASIA LASHAE COLEMAN, a/k/a "Nasia" was a member of the MILLAs and, at one time, may have held the rank of 1-Star.

- g. JERMAY SMITH, JR., a/k/a "Little Trill" was a member of the MILLAs.
- h. JALEN CORMARRIUS TERRY, a/k/a "Fats" held a leadership position as a 5-Star in the MILLAs at one time.

The Racketeering Conspiracy

- 10. From within or about sometime in 2015, the exact date being unknown to the Grand Jury, and continuing through the date of this Indictment, in the Western District of Virginia and elsewhere, the defendants, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, MONTEZ LAMAR ALLEN, JAVONTAY JACQUIS HOLLAND, TANASIA LASHAE COLEMAN, JERMAY SMITH, JR., and JALEN CORMARRIUS TERRY, together with each other and other persons known and unknown, being persons employed by and associated with the MILLAs, an enterprise which was engaged in, and the activities of which affected interstate and foreign commerce, knowingly and intentionally did combine, conspire, confederate and agree with each other, and with persons known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving:
 - a. Murder, chargeable under Virginia Code, Section 18.2-32, 18.2-22,
 18.2-26 and 18.2-18 and the common law of Virginia;
 - b. Robbery, chargeable under Virginia Code, Section 18.2-58, 18.2-22,18.2-26 and 18.2-18 and the common law of Virginia;

multiple acts indictable under:

- c. 18 U.S.C. § 1512 (Tampering with a witness, victim, or an informant); multiple offenses involving:
- d. Trafficking in controlled substances in violation of 21 U.S.C. §§ 841 and 846.
- 11. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

- 12. In furtherance of the conspiracy and to achieve the objective thereof, the defendants, and others known and unknown to the Grand Jury, performed and caused to be performed a number of overt acts in the Western District of Virginia and elsewhere. The overt acts performed by the conspirators included, but are not limited to:
 - a. On June 15, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, TANASIA LASHAE COLEMAN, JALEN CORMARRIUS TERRY, and others known and unknown to the Grand Jury, did shoot and attempt to murder Armonti Devine Womack and Dwight Montel Harris at the Southwyck Apartment complex in Danville, Virginia.
 - b. On or about August 20, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, MONTEZ LAMAR ALLEN, JAVONTAY JAQUIS HOLLAND, TANASIA LASHAE COLEMAN, JERMAY SMITH, JR., and others known and unknown to the Grand Jury, murdered Christopher Lamont Motley in the Southwyck Apartment complex in Danville, Virginia and did shoot at and attempt to murder Justion Wilson.
 - c. On June 2, 2017, MONTEZ LAMAR ALLEN did possess with the intent to distribute marijuana, a Schedule I controlled substance. At the time of possession of the marijuana he also possessed a firearm.

- d. On or between 2016 through 2018, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JAVONTAY HOLLAND, TANASIA LASHAE COLEMAN, MONTEZ LAMAR ALLEN, JERMAY SMITH, JR., JALEN CORMARRIUS TERRY and others known and unknown to the Grand Jury, trafficked in marijuana throughout the Danville, Virginia region.
- e. On or between December 2015 through August 2016, DASHAWN ROMEER ANTHONY, JERMAY SMITH, JR., TREDARIUS JAMERIQUAN KEENE, and others known and unknown to the Grand Jury, were involved in a number of assaults with a deadly weapon throughout Danville, Virginia.

NOTICE OF SPECIAL SENTENCING FACTORS

- 13. That on or about August 20, 2016, in the Western District of Virginia, defendants DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JAVONTAY JACQUIS HOLLAND, MONTEZ LAMAR ALLEN, TANASIA LASHAE COLEMAN, and JERMAY SMITH, JR., did willfully, deliberately, and with premeditation, kill Christopher Lamont Motley, in violation of Title 18.2, Virginia Code, Sections 32 and 18.
 - 14. All in violation of Title 18, United States Code, Sections 1962(d) and 1963.

COUNT TWO

Violent Crime in Aid of Racketeering, to-wit: Attempted Murder of Armonti Devine Womack

The Grand Jury further charges that:

15. At all times relevant to this Indictment, the MILLAs, including its leaders, members, and associates, as more fully described in paragraph 1 through 10 of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein,

constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

- 16. At all times relevant to this Indictment, the above-described enterprise, through its leaders, members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, multiple acts involving murder and robbery in violation of Virginia law; and trafficking in controlled substances in violation of 21 U.S.C. §§ 841 and 846.
- 17. On or about June 15, 2016, in the Western District of Virginia, for the purpose of maintaining and increasing position in the MILLAS, an enterprise engaged in racketeering activity, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, did attempt to murder Armonti Devine Womack in violation of Virginia Code Sections, 18.2-32, 18.2-26, and 18.2-18.
 - 18. All in violation of Title 18, United States Code, Sections 2 and 1959(a)(5).

COUNT THREE

Use of Firearm During a Violent Crime in Aid of Racketeering, to-wit: Attempted Murder of the Armonti Devine Womack

The Grand Jury further charges that:

- 19. On or about June 15, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, and JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, in the Western District of Virginia, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959(a)(5), as set forth in Count Two of this Indictment.
 - 20. All in violation of Title 18, United States Code, Sections, 2 and 924(c)(1)(A)(iii).

COUNT FOUR

Violent Crime in Aid of Racketeering, to-wit: Assault with a Dangerous Weapon of Armonti Devine Womack

- 21. Paragraphs 15 and 16 of Count Two are realleged and incorporated by reference herein.
- 22. On or about June 15, 2016, in the Western District of Virginia, for the purpose of maintaining and increasing position in the MILLAs, an enterprise engaged in racketeering activity, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, did assault Armonti Devine Womack with a dangerous weapon in violation of Virginia Code Section, 18.2-282 and 18.2-18.
 - 23. All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT FIVE

Use of Firearm During a Violent Crime in Aid of Racketeering, to-wit: Assault with a Dangerous Weapon of Armonti Devine Womack

The Grand Jury further charges that:

- 24. On or about June 15, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, in the Western District of Virginia, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959, as set forth in Count Four of this Indictment.
 - 25. All in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(iii).

COUNT SIX

Violent Crime in Aid of Racketeering, to-wit: Attempted Murder of Dwight Montel Harris

- 26. Paragraphs 15 and 16 of Count Two of this Indictment are realleged and incorporated by reference as though set forth fully herein.
- On or about June 15, 2016, in the Western District of Virginia, for the purpose of maintaining and increasing position in the MILLAs, an enterprise engaged in racketeering activity, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, did attempt to murder Dwight Montel Harris in violation of Virginia Code Sections, 18.2-32, 18.2-26, and 18.2-18.
 - 28. All in violation of Title 18, United States Code, Sections 2 and 1959(a)(5).

COUNT SEVEN

Use of Firearm During a Violent Crime in Aid of Racketeering, to-wit: Attempted Murder of the Dwight Montel Harris

The Grand Jury further charges that:

- 29. On or about June 15, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, in the Western District of Virginia, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959, as set forth in Count Six of this Indictment.
 - 30. All in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(iii).

COUNT EIGHT

Violent Crime in Aid of Racketeering, to-wit: Assault with a Dangerous Weapon of Dwight Montel Harris

- 31. Paragraphs 15 and 16 of Count Two of this Indictment are realleged and incorporated by reference as though set forth fully herein.
- 32. On or about June 15, 2016, in the Western District of Virginia, for the purpose of maintaining and increasing position in the MILLAs, an enterprise engaged in racketeering activity, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, did assault Dwight Montel Harris with a dangerous weapon in violation of Virginia Code Section, 18.2-282 and 18.2-18.
 - 33. All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT NINE

Use of Firearm During a Violent Crime in Aid of Racketeering, to-wit: Assault with a Dangerous Weapon of Dwight Montel Harris

The Grand Jury further charges that:

- 34. On or about June 15, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JALEN CORMARRIUS TERRY, and TANASIA LASHAE COLEMAN, in the Western District of Virginia, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959, as set forth in Count Eight of this Indictment.
 - 35. All in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(iii).

COUNT TEN

Violent Crime in Aid of Racketeering, to-wit: Murder of Christopher Lamont Motley

- 36. Paragraphs 15 and 16 of Count Two of this Indictment are realleged and incorporated by reference as though set forth fully herein.
- 37. On or about August 20, 2016, in the Western District of Virginia, for the purpose of maintaining and increasing position in the MILLAS, an enterprise engaged in racketeering activity, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JAVONTAY JACQUIS HOLLAND, MONTEZ LAMAR ALLEN, TANASIA LASHAE COLEMAN, and JERMAY SMITH, JR., did murder Christopher Lamont Motley, in violation of Virginia Code Section, 18.2-32 and 18.2-18.
 - 38. All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

COUNT ELEVEN

Use of Firearm During a Violent Crime in Aid of Racketeering, to-wit: Murder of Christopher Lamont Motley

The Grand Jury further charges that:

- 39. On or about August 20, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JAVONTAY JACQUIS HOLLAND, MONTEZ LAMAR ALLEN, TANASIA LASHAE COLEMAN, and JERMAY SMITH, JR., in the Western District of Virginia, did knowingly use, carry, brandish and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959, as set forth in Count Ten of this Indictment, and in the course of a violation of Title 18, United States Code, Section 924(c), caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a).
 - 40. All in violation of Title 18, United States Code, Sections 2 and 924(j).

COUNT TWELVE

Violent Crime in Aid of Racketeering, to-wit: Attempted Murder of Justion Wilson

- 41. Paragraphs 15 and 16 of Count Two of this Indictment are realleged and incorporated by reference as though set forth fully herein.
- 42. On or about August 20, 2016, in the Western District of Virginia, for the purpose of maintaining and increasing position in the MILLAs, an enterprise engaged in racketeering activity, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JAVONTAY JACQUIS HOLLAND, MONTEZ LAMAR ALLEN,

TANASIA LASHAE COLEMAN, and JERMAY SMITH, JR., did attempt to murder Justion Wilson in violation of Virginia Code Sections, 18.2-32, 18.2-26, and 18.2-18.

43. All in violation of Title 18, United States Code, Sections 2 and 1959(a)(5).

COUNT THIRTEEN

Use of Firearm During a Violent Crime in Aid of Racketeering, to-wit: Attempted Murder of the Justion Wilson

The Grand Jury further charges that:

- 44. On or about August 20, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, MONTEZ LAMAR ALLEN, JAVONTAY JACQUIS HOLLAND, TANASIA LASHAE COLEMAN, and JERMAY SMITH, JR., in the Western District of Virginia, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959, as set forth in Count Twelve of this Indictment.
 - 45. All in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(iii).

COUNT FOURTEEN

Violent Crime in Aid of Racketeering, to-wit: Assault with a DangerousWeapon of Justion Wilson

The Grand Jury further charges that:

46. Paragraphs 15 and 16 of Count Two of this Indictment are realleged and incorporated by reference as though set forth fully herein. On or about August 20, 2016, in the Western District of Virginia, for the purpose of maintaining and increasing position in the MILLAS, an enterprise engaged in racketeering activity, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, TREDARIUS JAMERIQUAN KEENE, JAVONTAY

JACQUIS HOLLAND, MONTEZ LAMAR ALLEN, TANASIA LASHAE COLEMAN, and JERMAY SMITH, JR., did-assault Justion Wilson with a dangerous weapon in violation of Virginia Code Section, 18.2-282 and 18.2-18.

47. All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT FIFTEEN

Use of Firearm During a Violent Crime in Aid of Racketeering, to-wit: Assault of Justion Wilson with a Dangerous Weapon

The Grand Jury further charges that:

- 48. On or about August 20, 2016, DASHAWN ROMEER ANTHONY, DEMETRIUS ALLEN STATEN, MONTEZ LAMAR ALLEN, TREDARIUS JAMERIQUAN KEENE, JAVONTARY JACQUIS HOLLAND, TANASIA LASHAE COLEMAN and JERMAY SMITH, JR., in the Western District of Virginia, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1959, as set forth in Count Fourteen of this Indictment.
 - 49. All in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(iii).

A TRUE BILL this \mathcal{N} day of June, 2018.

/s/ FOREPERSON FOREPERSON

Thomas T. Callen by/mu THOMAS T. CULLEN UNITED STATES ATTORNEY